Privacy Policy

This page provides an outline of the way in which the Reply website www.career.reply.com (hereinafter, the "Website") is managed, with specific regard to the processing of visitors' personal data. This notice is provided pursuant to Section 13 of EU Regulation no. 679/2016 (hereinafter, the "Regulation") and it is addressed to all who interact via the web services provided by Reply S.p.A., accessed by electronic telecommunications means through the address: www.career.reply.com. This notice only applies to the Website and it does not apply to any other sites accessed by the user via links.

Data controller and Data Protection Officer (DPO)

When identified or identifiable users access this Website, personal data of the said users may be processed.

The 'Data Controller' is Reply S.p.A. with registered office in Corso Francia 110, Turin.

Data related to the Website services are processed exclusively by Reply staff, entrusted with this task. No personal data generated by the web service is transferred to third parties. Personal data provided by users are used for the sole purposes of providing requested services and performing the tasks requested. Personal Data are transferred to third parties only when necessary in furtherance of these interests.

The contact details of the Data Protection Officer (DPO) are:

- DPO Italy: dpo.it@reply.it
- DPO Germany: dpo.de@reply.de
- DPO UK: dpo.uk@reply.com

Types of processed data

Navigation data

IT systems and software procedures adopted for the functioning of this Website, as a part of their normal functioning, collect several personal data which are transferred as a part of the normal course of events when using Internet (based on TCP/IP protocol).

These information are not collected in order to be linked to the specific persons it refers to. However, its nature is such that, through processing and collating of data held by third parties, it may be possible to identify navigating users.

This class of information includes IP addresses or the domain names of the computers of users visiting the Website, the addresses of requested resources in URI (Uniform Resource Identifier), the time of the request, the method used to forward the request to the web server, the size of the file obtained as response, the numerical code indicating the status of the response provided by the web server (successful, error, etc...) and other parameters relative to operating system and to user's IT environment. These data are only to be used for the control of the correct functioning of the said Website and in order to optimize its functionality in relation to the offered services.

Please note that the said data may be used for investigations aimed to identify any persons responsible for actions classed as computer crime, which are detrimental to the Website or linked Websites. If no such investigations are conducted, the data relative to web contacts is destroyed in a few days.

Data provided voluntarily by user

When e-mail messages are voluntarily sent to the addresses indicated in the address section of the Website, this implies the acquisition of certain personal data of the requesting party, including the requesting party's e-mail address (necessary for response to requests).

Cookies

The Website uses "cookie" technology. For information regarding the Cookies used by the Website, how they are used and how to manage them, consult the "Cookie Policy" section of this document.

Optional data provision

Apart from the above-described navigation data, users are free to provide personal information in the electronic request forms in Website sections for specific requested services. Please also note that it may not be possible to process requests if these data are not provided.

Processing procedures and security measures

Personal data are processed by Reply employees and collaborators by means of automated and non-automated equipment and only for no longer than are required to fulfil tasks for which the said data was collected. Conformity with specific security measures is ensured in order to prevent data losses, illicit or incorrect use, and unauthorized access.

Rights of concerned individuals

The individuals have the right to request to the Data Controller, according to applicable legal conditions, to access to their personal data and to obtain the correction or deletion of said data, or to limit the processing of their data, or to oppose its processing. The individuals, quando ne ricorrono le condizioni di legge, also have the right to data portability.

The individuals have the right to withdraw their consent at any time without prejudice to the lawfulness of the processing based on the consent given before withdrawal.

The individuals have the right to lodge a complaint with the competent Supervisory Authority.

Requests of this nature are to be addressed to e-mail address privacy@reply.com or sent to Reply S.p.A. - Corso Francia n. 110 - 10143 Torino.

Minors

Reply does not knowingly use its Website to request data from minors or persons of less than 18 years of age.

Cookie Policy

The Website uses Cookies to make its services simple and effective for users visiting the portal page.

Cookies are text files, or parcels of information sent from a web server (the Website) to the user's browser, which are memorised on the computer and automatically returned to the server every time the Website is accessed.

There are various types of Cookie, some used to make using the Website more efficient, others to enable certain functions. For example, Cookies can:

- memorise entered preferences;
- prevent users from having to re-enter the same information several times during their visit, for example username and password;
- analyse use of the services and contents provided by the Website visited in order to optimise the browsing experience and services offered;

Types of Cookies used by the Reply Website

The types of Cookies used by the Website are listed below, grouped according to their reasons for use.

Technical Cookies

This type of Cookie allows certain Website sections to function correctly and is essential in order to allow the user to browse the Website and use its features. There are two categories of technical cookies:

- persistent: once the browser has been closed these are not cancelled, but last until a pre-defined expiry date;
- session: these are automatically cancelled each time the browser is closed.

These Cookies, always sent by the "reply.com" domain, are necessary for the correct visualisation of the Website and, in relation to the technical services offered, they will therefore always be used and sent (unless the user modifies the settings in his or her browser). Included in this category are the persistent Cookies used to allow the user to register to the Website and access to its personal area.

The aforementioned Cookies used by the Website avoid the need to use other data processing techniques which could potentially reduce the confidentiality of the users' navigation of the Website, and do not permit the acquisition of identifying personal information regarding the user.

Functionality Cookies

The Cookies in this category are used to memorise certain settings selected by the user, in order to remember their preferences during future visits.

These Cookies can have the duration of a session but they are generally persistent and sent from the "reply.com" domain. They may also be used when providing a service not explicitly requested by, but provided to the user.

The information gathered by these cookies is anonymous and cannot track the user's behaviour on other websites.

Included in this category, for example, are first-party Cookies used to memorise the user's preferences regarding the country of origin and therefore the language in which the text of the Website is viewed.

The user's consent

According to Cookie Law (2009/136/CE Directive), the Website is not obliged to request consent for first-party technical and analytical Cookies, as they are necessary in order to provide the services requested. They are therefore installed automatically by the Website during the user's first visit to any page of the portal.

How to manage the Cookies used by the Reply Website through browser configuration

Nearly all internet browsers are set up to automatically accept Cookies. The user can modify the predefined configuration (generally set to "medium" level) and disable Cookies, selecting from the form provided (generally entitled "Privacy") the highest level of protection. In all cases, the user also has the opportunity to delete individual Cookies from his or her computer by going to "Internet Options", Tools menu and selecting the "General" form and clicking the appropriate deletion button.

Below are more detailed instructions for managing Cookies on the part of the user for the more common browsers. The user can find further information at http://www.allaboutcookies.org/. To delete Cookies from the internet browser of your smartphone/tablet, you should refer to the device's user manual.

Chrome

1. Click on the ("Settings") menu in the browser's toolbar next to the window for inserting the url when browsing.
2. Select "Settings".
3. Click on "Show Advanced Settings" at the end of the list.
4. In the "Privacy" section click on the "Contents settings" button.
5. In the "Cookie" section it is possible to modify the following settings regarding Cookies:
   - Allow local data to be set
   - Keep local data only until you quit your browser
   - Block sites from setting any data
   - Block third-party cookies and site data
   - Manage exceptions for certain Websites
   - Delete some or all Cookies

Mozilla Firefox

1. Click on the ("Settings") menu in the browser's toolbar next to the window for inserting the URL when browsing.
2. Select "Options"
3. Select the "Privacy" panel
4. In the "Tracking" section it is possible to modify the following settings regarding Cookies:
   - Tell sites that I do not want to be tracked
5. In the "History" section it is possible:
   - By enabling "Use custom settings for history" choose to accept third party Cookies (always, from the most visited sites or never) and to conserve them for a determined period of time (until they expire, until I close Firefox or ask me every time)
   - Remove individual stored Cookies

Internet Explorer

1. Click on the "Tools" button and select "Internet Options"

2. Click on the "Privacy" tab and in the "Settings" section, move the slider to the desired action for Cookies:
   - Block all Cookies
   - Allow all Cookies
   - Selecting which sites to allow Cookies from: move the cursor to an intermediate position in order neither to block nor allow all Cookies, then click on "Sites", in the "Website address" insert a Website then press "Block" or "Allow"

Safari

1. Click on Safari, select Preferences and click on Privacy
2. In the Block Cookies section specify how Safari must accept Cookies from Websites.
3. To view which Websites have stored Cookies click on Details

In all cases, the user is advised to check his or her browser settings from time to time.

This document will be updated at Reply discretion and whenever necessary in order to inform about the modalities and purposes of the processing.

The updated version is available on the Website.

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